

February 24, 2010

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street SW Suite TW-A325 Washington, DC 20554

RE: Certification of CPNI Filing

Ms. Dortch,

In compliance with the FCC's rules, enclosed please find CloseCall America, Inc.'s ("CloseCall") Customer Proprietary Network Information (CPNI) Certification for the year 2009 and accompanying statement ensuring compliance with the FCC's CPNI rules.

Regards,

Courtenay Schroeder CloseCall America, Inc.

C. Schroeder

Attachment

Cc: Best Copy and Printing, Inc. (via email)

## Annual 47 C.F.R. S: 64.2009(e) CPNI Certification Template

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

1. Date filed: February 24, 2010

2. Name of company covered by this certification: CloseCall America, Inc.

3. Form 499 Filer ID: 821270

4. Name of signatory: Douglas Bethell

5. Title of signatory: President

6. Certification:

I, Douglas Bethell, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, record keeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI

The company represents and warrants that the above certification is consistent with 47. C.F.R. S: 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Doeyler & Bellow

## Customer Proprietary Network Information (CPNI) Privacy Policy

## Operating Procedures

CloseCall has not and will not engage in the practice of selling, lending, or licensing any customer proprietary information ("CPNI") to a third-party vendor for any purpose. Third-party contractors sign Non-Disclosure Agreements and face civil penalties for improper use of the Company's proprietary information.

Employees of the Company are provided information and training regarding the CPNI rules. No employee shall disclose CPNI to anyone other than the customer unless written authorization has been provided to the Company.

All company records and information relating to the company, its employees, or its customers are confidential and employees must, therefore, treat all matters accordingly. There can be no removal of any company-related information, including without limitation, documents, notes, files, records, computer files, equipment, office supplies or similar materials from the employer's premises without permission from the company.

Additionally, the contents of the employer's records or information otherwise obtained in regard to day to day business dealings may not be disclosed to anyone, except where required for a legitimate business purpose.

Employees must not disclose any confidential information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the Company. Employees will be subject to appropriate disciplinary action, up to and including dismissal, for knowingly or unknowingly revealing information of confidential nature.

In addition, when an employee leaves the company, the employee must return all Company related information and property that the employee has in his/her possession. New employees undergo a background check before beginning employment with the Company

Customer data is housed in secure databases that are constantly monitored. CloseCall uses NAT firewalls to secure its network and Active Directory authentication to access its Local Area Network (LAN.)